



February 18, 2011  
VIA ECFS

Ms. Marlene H. Dortch, Commission Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street SW, Suite TW-A325  
Washington, DC 20554

**RE: EB Docket No. 06-36**  
**2010 CPNI Certification Filing for All Access Telecom, Inc.**

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Enforcement Advisory No. 2011-02, DA 11-159, EB Docket No. 06-36, released January 28, 2011 and pursuant to 47 C.F.R. § 64.2009(e), All Access Telecom, Inc. files its Certification and supporting Statement of CPNI Procedures and Compliance for the year 2010. Please include this Certification in EB Docket No. 06-36.

Please contact me at 407-740-3031 or [sthomas@tminc.com](mailto:sthomas@tminc.com) if you have any questions about this filing.

Sincerely,

/s/Sharon Thomas  
Sharon Thomas  
Consultant to All Access Telecom, Inc.

*ST/im.*

*Enclosure*

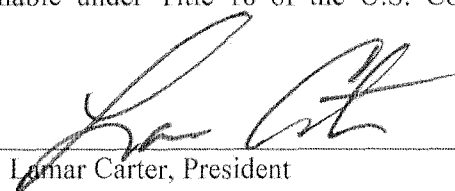
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L. Carter, All Access Telecom, Inc.  
File: All Access - FCC CPNI  
TMS: FCC1101

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification	Covering calendar year 2010
Name of company(s) covered by this certification:	All Access Telecom, Inc.
Form 499 Filer ID:	828077
Name of signatory:	Lamar Carter
Title of signatory:	President

1. I am the President of All Access Telecom, Inc. and, acting as an agent of the company, I have personal knowledge of the that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq.*
2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 *et seq.* of the Commission's rules.
3. The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
\_\_\_\_\_  
Lamar Carter, President

2/16/2011  
\_\_\_\_\_  
Date

**Attachment:** Statement of CPNI Procedures and Compliance



**Attachment A**  
**Statement of CPNI Procedures and Compliance**

**All Access Telecom, Inc.**  
**Statement of CPNI Procedures and Compliance**

All Access Telecom, Inc. ("All Access" or "Company") provides wholesale terminating VOIP services to other VOIP carriers and as such does not have any subscribed service relationship with end user business or residential customers. The Company does not obtain, retain or use CPNI for any purpose. Although the Company has call detail records, it does not have any information regarding the calling or called party. The Company is committed to protecting the confidentiality of all customer information, including CPNI and call detail records. Company employees are prohibited from disclosing such information and the Company has procedures which provide for disciplinary action for violations of the Company's privacy standards, up to and including termination of employment.

The Company does not disclose call detail information over the telephone.

The Company does not disclose call detail information on-line.

The Company does not have any retail locations and therefore does not disclose call detail records in-store.

Should the Company expand its business in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI, including call detail records, is used or disclosed.

Requests for call detail records by law enforcement agencies are only granted pursuant to a valid subpoena.

The Company has procedures in place to notify law enforcement in the event of a breach of customers' CPNI and to ensure that the affected customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement. Specifically, as soon as practicable, and in no case later than seven business days upon learning of a breach, the company will notify the U.S. Secret Service and the FBI by electronic means, as required by FCC regulations. The company will not notify customers or disclose a breach to the public until seven full business days have

passed after notification to the U.S. Secret Service and the FBI, unless it believes there is an extraordinarily urgent need to notify customers before seven days in order to avoid immediate and irreparable harm. In that instance, it will only notify such customers *after* consultation with the relevant investigating agency and will cooperate with the agency's request to minimize any adverse effects of the customer notification. If the Company receives no response from law enforcement after the seventh full business day, it will promptly proceed to inform the customers whose CPNI was disclosed of the breach. The company will delay notification to customers or the public if requested to do so by the U.S. Secret Service or FBI. Notifications to law enforcement and customers are handled by a designated supervisor level employee responsible for managing the company's CPNI compliance.

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI, including call detail records, in calendar year 2010.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call detail records.